

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of: Amendment of Service and Eligibility rules for FM Broadcast Translator Stations.

Reference: MB Docket No. 07-172
RM-11338

Comments Regarding FCC's Notice of Proposed Rulemaking

United Ministries is a non-profit, educational organization incorporated and currently operating in the states of Pennsylvania and Colorado. In addition, United Ministries is an exempt 501(c) 3 organization under the auspices of the Internal Revenue Service. Both United Ministries AM stations in Colorado operate non-commercially, dependent largely on listener donations to fund day-to-day operations.

United Ministries is licensee for two AM stations in Colorado: KJOL-AM, Grand Junction, CO and KDTA-AM, Delta, CO. As licensee for these two stations, United Ministries is in support of allowing AM stations to simulcast on FM translators, per the following comments:

- United Ministries suggests that the proposed fill-in service for licensees be allowed so long as the 60 dBu contour of the FM translator exceeds neither the 2 mV/m daytime contour of the station or a circle with its center at the AM transmitter site and a radius of 25 miles, *whichever is greater*. KJOL-AM (620) is a daytime station, operating at 5kw during the day, but with only 79 watts nighttime. A very large segment of our coverage is lost during the nighttime hours. A 25-mile limit would greatly enhance coverage to our city of license, but many listeners are and would continue to be deprived of the service they enjoy by day. Also, KDTA-AM (1400) as a Class Four station suffers significant nighttime "skywave interference" from the many stations nationwide operating on the same frequency.
- United Ministries further suggests the Commission allow *multiple* FM translators within the 2 mV/m daytime contour of the station or a circle with its center at the AM transmitter site and a radius of 25 miles, so long as the 60 dBu contour of the FM translator exceeds neither the 2 mV/m daytime contour of the station or a circle with its center at the AM transmitter site and a radius of 25 miles, *whichever is greater*. The terrain and distance(s) between communities of Western Colorado effectively hinders or blocks the delivery of FM signal(s) to many areas within the 2 mV/m daytime contour of KJOL-AM. Multiple FM translators would allow United Ministries to serve

current AM listeners 24 hours a day. Additionally, the challenge of terrain blockage and distance applies to many stations in the Western United States.

- United Ministries proposes the Commission allow extended coverage beyond a station's current 2 mV/m daytime contour as applicable to the Commission's current rules for independent ownership of FM translators.
- United Ministries proposes that delivery of programming from the source of origination be allowed by any means possible, thus easing the difficulty of delivery to remote FM translator sites.
- With the proliferation of new stations, potential interference at night from other stations on the same or adjacent frequencies results in the shrinking of coverage with no compensating signal growth. Add to the equation the growth of the marketplace, and the net result is less service provided and less access to our donor base for needed income to sustain our ministry.
- Many daytime listeners have noted the loss of service at night and expressed a desire for more access to United Ministries' programming in the nighttime hours.
- Western Colorado, our region of operation, has a growing but dispersed population. Fill-in coverage to those persons within our 2 mV/m daytime contour would greatly impact our service to potential listeners, particularly for KJOL-AM. It is difficult even now to provide clear nighttime coverage for KJOL-AM, Grand Junction to a significant portion of the population within the Grand Junction city limits.
- Operating at reduced or eroded nighttime coverage precludes or diminishes the value of broadcasting various community events, such as concerts, parades, sporting events, festivals, etc.
- While the Commission has historically recognized the value of AM radio to public interest, convenience and necessity of the public overall, it is equally true that AM radio has had to face increased competition from a variety of media sources, not the least of which is FM radio. Allowing AM station to supplement coverage with FM translators would greatly level the playing field as AM broadcasters endeavor to compete in the 21st century world of broadcasting.
- United Ministries suggests the rule changes allowing FM translator use by AM stations be effective at once, upon adoption of the rules, for all AM stations desiring to broadcast in said manner.
- It has been suggested by some commenter(s) that AM commercial stations not be allowed to operate in the FM reserved band. United Ministries counters that the Commission allow any station to own, operate and broadcast in the reserved band *if* 1) said station operates non-commercially, 2) is an IRS exempt 501(c) 3 organization and 3) is exempted from regulatory fees by the Commission. KJOL-AM and KDTA-AM are both licensed commercially, but fall within the points proposed above. There is no logical reason to prohibit stations that operate thusly from accessing the reserved band.

Conclusion:

United Ministries respectfully requests that the Commission adopt the rules in a timely manner as proposed and qualified by the suggestions and points as submitted by United Ministries, allowing AM radio stations to better compete and serve in the ever changing media marketplace.

Respectfully submitted,

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